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IN THE UNITED STATES FEDERAL DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, PR

IN RE: THE FINANCIAL OVERSIGHT
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of THE
COMMONWEALTH OF PUERTO RICO

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**MOTION IN OPPOSITION TO PETITION (DOCKET 1881) AND IN
RESPONSE TO ORDER (DOCKET 1885)**

I, JAVIER MANDRY-MERCADO, co-Plaintiff Pro Se, hereby declare and request that:

Petitioner hereby requests this court vacate scheduling order and to order the Commonwealth to provide a copy of the referenced contract and an identification geo-referencing the lots mentioned in the referenced contract. If the information that this petitioner is correct, Eduardo Mandry-Mercado and his lacked legal capacity to engage in such contract.

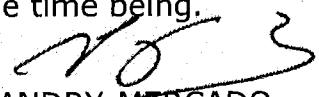
FACTUAL AND LEGAL BASIS

1. This motion responds in opposition to dockets 1881 and in compliance to order 1885 as to respond by December 6, 2017.
2. Per motion 1881, Cofina seeks to ratify a contract that Eduardo Mandry Mercado and his wife, Lucia Casas-Casal. The contract arises from a stipulation of a case where this petitioner was not a party. The contract involves a shooting range and a rent for one-dollar a month.

3. After careful study of the motion and having contacted the attorneys that filed said motion, my objection follows the same modus operandi of fraud as that referenced in docket 684.
4. As co-owner of the hereditary mass referenced in Docket 684, this petitioner is knowledgeable of the title ownership, of which I believe to be co-owner. Additionally, this petitioner has evidence to demonstrate a violation of due process has occurred due to failure to obtain proper judicial authorization for the deed of the shooting range, issue which would be intimately related to the subject-matter.
5. Before proceeding to file an adversary proceeding related to the aforementioned, the requested evidence is necessary to confirm or deny legitimate and tangible suspicions of fraud related to such contract.
6. I attempted with the attorneys referenced in the motion (docket 1881) to provide the evidence, but they did not have it at their disposal. An attempt to contact Jose Moreda, the attorney who represented Eduardo Mandry Mercado in the state claim. He has not responded, nor is he expected to respond.
7. Regarding the date scheduled to discuss motion (docket 1881) on December 20, 2017, I express that I would not be unable to assist the hearing on the matter on the date scheduled. At about that date, I will be undergoing surgery and during the recovery period. Moreover, any discussion without the requested evidence would render the discussion premature, as an interrogatory and a request for admissions is foreseeable as part of an adversary proceeding.

Wherefore, I hereby request that this Court to order the Commonwealth of PR to provide to petitioner and the court the requested documents, and to vacate scheduling order related to docket 1881, for the time being.

DATE: December 2, 2017

Petitioner: 
JAVIER E. MANDRY-MERCADO
1326 Calle Salud Apt 1101
Ponce, PR 00717